

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
(Indianapolis Division)

RED BARN MOTORS, INC.,	*	DOCKET NO. 1:14-cv-01589-TWP-DKL
PLATINUM MOTORS, INC.,	*	
MATTINGLY AUTO SALES, INC.,	*	CLASS ACTION
YOUNG EXECUTIVE MANAGEMENT	*	Jury Trial Demanded
& CONSULTING SERVICES, INC.,	*	
Individually, and on behalf of other	*	
members of the general public	*	
similarly situated	*	
	*	
v.	*	
	*	
COX ENTERPRISES, INC.,	*	
COX AUTOMOTIVE, INC.,	*	
NEXTGEAR CAPITAL, INC.,	*	
F/K/A DEALER SERVICES	*	
CORPORATION, successor by merger	*	
with Manheim Automotive Financial	*	
Services, Inc., and JOHN WICK	*	
	*	

**DECLARATION OF NAMED PLAINTIFF, RED BARN MOTORS, INC.,
IN SUPPORT OF MOTION FOR CLASS CERTIFICATION**

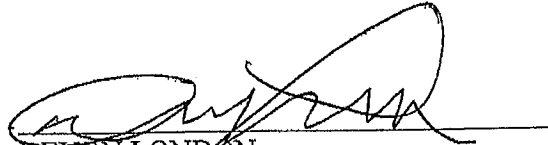
I, DEVON LONDON, having been first duly sworn according to law, hereby declare, depose, state, affirm and aver as follows:

1. I am the General Manager of Red Barn Motors, Inc., a used car dealership located in Baton Rouge, Louisiana.
2. Red Barn Motors, Inc. is one of the named Plaintiffs in the above-captioned lawsuit. I am aware of the matters set forth herein and the following facts and information of my own personal knowledge, and if called upon to testify to such matters, I could and would competently so testify.

3. In July 2011, Red Barn Motors, Inc. contracted with Dealer Services Corporation n/k/a NextGear Capital, Inc. for a credit line of \$200,000 that was used to purchase used cars. This contract is commonly known in the used car industry as a "Floorplan Agreement."
4. Between 2011 and 2013, Red Barn Motors, Inc. floorplanned 524 vehicles and paid more than \$80,000 in interest to Dealer Services Corporation n/k/a NextGear Capital, Inc.
5. Red Barn Motors, Inc. is therefore a member of the Class on whose behalf the above-captioned class action is being brought and maintained.
6. As a result of the Defendants' conduct alleged in the Verified Amended Complaint, Red Barn Motors, Inc. has suffered monetary loss, including but not limited to interest and fees on money not lent, and damage to its business relationships.
7. To the best of my knowledge, information and belief, there is no conflict whatsoever between Red Barn Motors, Inc. and any other member of the Class or either subclass.
8. As a named Plaintiff in the above-captioned class action, Red Barn Motors, Inc. is committed to the vigorous prosecution of this litigation. Red Barn Motors, Inc.'s interests in the prosecution and outcome of the case are not antagonistic to the interests of any other member of the Class or either subclass. Rather, Red Barn Motors, Inc.'s interests coincide with the interests of the other members of the Class and the subclasses.
9. Red Barn Motors, Inc. has retained competent and experienced legal counsel to prosecute these claims vigorously on its behalf and on behalf of the Class and each subclass. On behalf of Red Barn Motors, Inc., I have no doubt that legal counsel will fairly and adequately represent and advance the interests of the Class and each subclass.

I DECLARE AND AFFIRM UNDER THE PENALTIES OF PERJURY THAT
THE
FOREGOING FACTS AND REPRESENTATIONS ARE TRUE AND CORRECT.

Executed at Denham Springs, La., this 29th day of September,
2016.


DEVON LONDON